

THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION

In re:	§	Chapter 11
PEPI COMPANIES LLC, <i>et al.</i> ,	§	Case No. 20-60056
Debtors.	§	(Jointly Administered)

**DEBTORS' EMERGENCY MOTION TO ADD COMPROMISES TO THE DEBTOR'S  
PENDING EMERGENCY MOTION TO (I) PAY SECURED CREDITORS AND  
(II) APPROVE COMPROMISES WITH CERTAIN UNSECURED CREDITORS**

(This relates to Docket No. 157)

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21-DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED, IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OF IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

A HEARING HAS BEEN SET ON THIS MOTION FOR DECEMBER 15, 2022, AT 3:00PM BEFORE THE HON. CHRIS LOPEZ IN COURTROOM 401 AT 515 RUSK, HOUSTON, TEXAS 77901. REMOTE PARTICIPATION INFORMATION ON THE COURT'S WEBSITE AT:

<https://www.txs.uscourts.gov/page/united-states-bankruptcy-judge-christopher-m-lopez>

**TO THE HONORABLE CHRISTOPHER LOPEZ,  
UNITED STATES BANKRUPTCY JUDGE:**

Pepi Companies LLC and its affiliates Alonti Corporation LLC, Pepi Corporation, Pepi Company of Illinois LLC and Pepi Company California LLC, (collectively, the “**Debtors**”), files this motion and respectfully shows the Court as follows:

1. The Debtors filed an *Emergency Motion to (I) Pay Secured Creditors and (II) Approve Compromises with Certain Unsecured Creditors* [DE 157] on December 7, 2022. The Court has set that motion and this one for hearing on December 15, 2022 at 3:00pm.

2. The Debtors seek to pay secured creditors in full and to pay certain unsecured creditors with whom compromises have been reached a discounted amount on their claims before the end of the calendar year, which is substantially earlier than payments would otherwise be required to be made under the confirmed plan.

3. Since filing the original motion, the Debtor has reached proposed compromises with two additional creditors (in red). The total current slate of proposed compromises is below:

<i><b>Claimant</b></i>	<i><b>Discounted Amount</b></i>
Briarwood Baytown Ltd.	\$160,000.00
Gowan Inc.	\$8,200.00
Leco Broadway 410, LLC	\$20,000.00
First Story Road, LLC	\$1,567.64
ITF MP Sorrento Mesa LLC	\$16,336.10
Ki Sang Song	\$22,825.82
Higgins Grove Plaza LLC	\$9,500.00
<b>GWP EAST, LLC</b>	<b>\$12,365.34</b>
<b>American Express</b>	<b>\$634,510.19</b>

4. An amended proposed order to the motion is attached along with a redline comparison of this revised proposed order and the proposed order filed with the original motion.

**PRAYER**

WHEREFORE, the Debtors respectfully requests that the Court grant the relief requested.

Dated: December 14, 2022

Respectfully submitted,

**JONES MURRAY LLP**  
By: /s/ Christopher Murray  
Christopher Murray  
Texas Bar No. 24081057  
[chris@jonesmurray.com](mailto:chris@jonesmurray.com)  
**COUNSEL FOR THE DEBTORS**

**CERTIFICATE OF ACCURACY**

I hereby certify that the facts and circumstances described in the above pleading giving rise to the emergency request for relief are true and correct to the best of my knowledge, information, and belief.

/s/ Christopher Murray  
Christopher Murray